

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

<b>EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION NO.: 3:23-cv-00359-KC</b>
	)	
	)	
<b>PARAMOUNT HEALTHCARE CONSULTANTS, LLC AND MPD OPERATORS NAZARETH HALL, LLC D/B/A NAZARETH LIVING CARE CENTER,</b>	)	
	)	
	)	
<b>Defendants.</b>	)	

**JOINT MOTION TO ENTER CONSENT DECREE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the Plaintiff, United States Equal Employment Opportunity Commission (“EEOC”), and Defendants, Paramount Healthcare Consultants, LLC and MPD Operators Nazareth Hall, LLC d/b/a Nazareth Living Care Center (“Defendants”) and file this, their Joint Motion to Enter Consent Decree in the above-captioned civil matter. In support of this Motion, they respectfully show the Court as follows:

EEOC and Defendants have resolved all matters regarding the EEOC’s Complaint in this litigation, as evidenced by their signatures on the Consent Decree accompanying this Motion (Exhibit “A”).

WHEREFORE, PREMISES CONSIDERED, EEOC and Defendants respectfully request that this Court enter the Consent Decree attached to this Motion, and to retain jurisdiction of this matter to enforce the terms and conditions of the attached Consent Decree.

Respectfully submitted,

Attorneys for Plaintiff

Attorney for Defendants

*/s/ Adriana Rodriguez*

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*/s/ Adriana Rodriguez  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the parties **Joint Motion to Enter Consent Decree**, has been forwarded to all counsel via electronic filing and via e-mail on this, the 7<sup>th</sup> day of February 2024.

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*/s/ Adriana Rodriguez*  
Adriana Rodriguez